

Annual 47 C.F.R. § 64.2009(e) CPNI
Certification
EB Docket 06-36



Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 25, 2009

Name of companies covered by this certification: Local Communications Network, LLC, Local Communications Network International, LLC, and BringCom, LLC^{1/}

Form 499 Filer ID: 826399

Name of signatory: Rich Kearney, Jr.

Title of signatory: Chief Operating Officer

I, Rich Kearney, Jr., certify that I am an officer of the company named above and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the customer proprietary network information ("CPNI") rules adopted by Federal Communications Commission ("Commission"). *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in Section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions against data brokers in the past year and the company has no information of any processes pretexters are using to attempt to access CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed

A handwritten signature in black ink, appearing to be 'Rich Kearney, Jr.', is written over a horizontal line.

^{1/} Local Communications Network, LLC and BringCom, LLC were granted approval of a Transfer of Control and transfer of related licenses last year. *See* WC Docket No. 07-248, *Notice of Domestic Section 214 Authorizations Granted*, Public Notice, DA 07-4921 (rel. Dec. 10, 2007); FCC file number ITC-214-19980506-00298; FCC file number ITC-T/C-20071029-00440; Report No. TEL-01212, *International Authorizations Granted*, Public Notice, DA 07-4897 (rel. Dec. 6, 2007). Local Communications Network, LLC is the sole shareholder of Local Communications Network International, LLC.

Statement Accompanying Annual Compliance Certificate

Pursuant to Section 64.2009 of the rules and regulations adopted by the Federal Communications Commission ("Commission"), 47 C.F.R. § 64.2009, Local Communications Network, LLC, Local Communications Network International, LLC and BringCom, LLC^{2/} (hereafter referred to as the "Company") have prepared this statement regarding compliance with the Commission's rules pertaining to customer proprietary network information, as defined in Section 222(h)(1) of the Communications Act of 1934, as amended, 47 U.S.C. § 222(h)(1) ("CPNI").

The Company has established the following practices to protect CPNI:

- **Employee Education:** Company employees are made aware of their obligations to comply with CPNI confidentiality requirements.
- **Informing Customers:** Company customers are made aware of the Commission's CPNI rules and the requirement that CPNI be kept confidential.
- **Customer CPNI Restriction:** Company customers can restrict the use of their CPNI to the extent use of their CPNI may be restricted pursuant to the Commission's CPNI rules.

In the event the Company conducts a marketing campaign that utilizes CPNI, the Company will utilize the following procedures:

- **System to Retain Records of the Company's Sales and Marketing Campaigns:** Company will maintain records relating to sales and marketing campaigns that use CPNI.
- **Supervisory Review Process for All Sales and Marketing Campaigns:** Sales and marketing campaigns will be reviewed to ensure that they comply with the Commission's CPNI rules. Company will retain records of such reviews.
- **Process to Maintain Customer Approvals:** Company will obtain customer consent to use CPNI and retain records of such approvals. When customer approval is required, Company's system will allow its employees, affiliates, agents, joint venture partners, or independent contractors to determine the status of a customer's approval to use its CPNI.
- **Procedures to Communicate Opt-Out Failures to the FCC:** Company will have procedures in place to determine when its opt-out procedures are not working effectively, and will notify the Commission by letter within five business days if its opt-out mechanism is not working properly.

^{2/} Local Communications Network, LLC and BringCom, LLC were granted approval of a Transfer of Control and transfer of related licenses last year. See WC Docket No. 07-248, *Notice of Domestic Section 214 Authorizations Granted*, Public Notice, DA 07-4921 (rel. Dec. 10, 2007); FCC file number ITC-214-19980506-00298; FCC file number ITC-T/C-20071029-00440; Report No. TEL-01212, *International Authorizations Granted*, Public Notice, DA 07-4897 (rel. Dec. 6, 2007). Local Communications Network, LLC is the sole shareholder of Local Communications Network International, LLC.